

Exhibit J

Kathleen Negri

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
KATHLEEN NEGRI**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

KATHLEEN NEGRI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18 Redwood Lane, South Setauket, NY 11720.

2. I am currently 61 years old, having been born on September 17, 1960.

3. I am the wife of Robert Negri, Jr. upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband died from esophageal cancer on September 28, 2011. His illness was deemed by the World Trade Center Health Program to be causally connected to his prolonged exposure to the toxic air resulting from the September 11, 2001 terrorist attack.

5. Robert and I were married for 27 years. We had a good marriage. We raised our three kids, and everything we did was for them. We really never went on vacations much, but we did two vacations with our kids that we adored and treasured. He was a good husband, he was loving, he provided us with a beautiful home. He was always there. We could always count on him. He was so handy, he did everything himself. He refused to let anyone else work on the

house. With him gone, we have to rely on people we don't know and trust, and they take advantage. He fixed our cars, repaired the pool, and he fixed anything around the house that needed to be done. He was a great husband and a great father.

6. My husband never liked to "bring work home." He was a Nassau County Police Officer, and whatever happened on the force, he always kept it to himself. But 9/11 was inescapable. I remember taking my kids to nursery school, and he called me to tell me that he didn't know when he'd be home. In the days following, he would go down to lower Manhattan and transport debris and remains. He also went to the Staten Island Fresh Kills landfill to search through debris. He didn't like to talk about it; it was depressing and devastating.

7. When Robert started having trouble swallowing, I urged him to see a friend of mine who was a gastroenterologist to get checked out. He went to get an endoscopy, and they couldn't even proceed because there was a mass in his throat. The doctor took me into a private room and said, "Kath, I think I see a mass in Rob's throat." That was the beginning.

8. He immediately went to get a sonogram and it progressed from there. He was diagnosed with Stage III-IV esophageal cancer. The doctors told us it would be fine, but it wasn't fine. They did more testing, then he went to surgery.

9. It was so stressful. First you get great news from the doctor, then bad news. It's like the doctors weren't on the same page. It was a nightmare going back and forth from Long Island to the city for my husband's cancer treatments and also trying to take care of my 12-year-old sons. I had to do dinner, laundry, helping my sons with homework, and keeping the house clean. Trying to get my daughter ready for college, graduation, and prom. All this time, I was just trying to make sure my husband was okay. It was so emotionally draining.

10. The night before Robert and I were supposed to take our daughter Samantha to college, he fell. He stayed in the hospital until 4:00 a.m. Then, that morning, I had to drive Samantha to college. It was miserable. Robert kept calling me that day, asking me to take him out of the hospital. It was a very, very emotional day for all of us. The emotional impact was immense.

11. Financially, it's hard to put three kids through college to begin with. But after your husband passes away, it's even harder. I had to put my three kids through college, buy them all cars, and pay for their extracurricular activities. We couldn't even afford summer

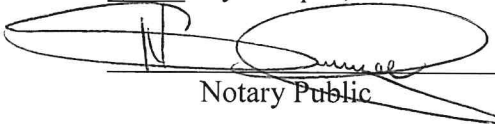
activities for our kids. My husband anticipated that he would retire from the police force and work full-time on construction projects. We were hoping to have that income, but when he passed, that all went away. There was no supplemental income. Sometimes, when he was in the hospital, it cost us over sixty dollars per day just to park at Sloan Kettering. Now, if something breaks in the house, I have to call a repairman to come and fix it. That costs four times what it would've if Robert was still here, because he would have fixed it himself. I have a daughter who wants to get married. I would like to give her a beautiful wedding, but it is so expensive.

12. Just watching him go from a strong proud man, to someone in so much pain, was extremely difficult. That was difficult for me and my kids to watch. One time he was in the hospital, and my boys said, "Mom, we have so much homework to do, we can't go to the hospital." But I said, "We have to go drop off some stuff for Dad." Then, the nurses asked me to help my husband into the shower. I remember it was so hard even getting him out of the bed, then into the wheelchair. Then out of the wheelchair and into the shower. It was so hard. He was literally skin and bones. It was a nightmare to watch.

13. Being a sole parent, I worry. I haven't slept a full night in over ten years. I worry about my kids, I worry about getting sick and leaving them with no parent. It's hard having no companionship, no affection and love from your spouse. Your kids love you, but they don't love you like your husband loves you. There's no one to confide in. You go on vacation, everyone is a couple, and you're alone. You go to a wedding, everyone else has someone to dance with, and you're alone. Things like that are very hard. Watching him slip away every day and having to tell your children that their father is dying is the most heart-wrenching thing anyone could ever have to do. It's a difficult life without a spouse.


KATHLEEN NEGRI

Sworn to before me this
7th day of April, 2022


Notary Public

NICHOLAS SENGER
Notary Public - State of New York
No. 01SE6307628
Qualified in Suffolk County
My Commission Expires July 07, 2022

Robert Negri III

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
ROBERT NEGRI III

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

ROBERT NEGRI III, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18 Redwood Lane, South Setauket, NY 11720.

2. I am currently 23 years old, having been born on June 30, 1998.

3. I am the son of Robert Negri, Jr. upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died at 56 years old from esophageal cancer on September 28, 2011. I was 13 years old at the time of his death.

5. My father and I had a strong and everlasting relationship. He gifted me with so many memories I'll cherish forever. Every since I was a kid, he would wake me up at 7:00am each Saturday and ask me if I wanted to come with him to Home Depot. I would help him out with side projects. I was his little right-hand helper for everything. He would always take me to his project sites and teach me about the construction industry. That's how I fell in love with construction. Another memory that I'll never forget is when we played little league football. He would be at every game, and he loved watching us play. He was the first parent to volunteer for

everything.

6. My brother and I were only three years old on September 11, 2001. My dad responded to the site eleven days later, with other members of the Nassau County Police Department, digging through the rubble to find victims and hopefully survivors. He was so dedicated to being a first responder.

7. We learned about my dad's cancer on Christmas night, after everyone had left. My siblings and I were all sat down at the dinner table and told the news. It was the most gut-wrenching news you could probably ever receive at 12 years old.

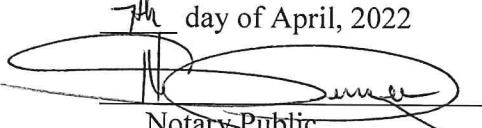
8. Emotionally, it was a roller coaster. Cancer has so many stages. I always remember the small things that my father would get angry about. He would get angry at us, but he wasn't angry with us. He was hurt by his situation. He probably thought, "Why me?" I always wanted to be outside with him, helping him with his construction projects and learning from him. But he would get so angry because I didn't know what I was doing. I wanted to learn, but he didn't have the energy to teach me anymore. It was also hard to see him in the hospital. I'll never forget seeing all the stitches on his chest and stomach.

9. Our family grew stronger during my father's illness. He taught us the importance of love for one another. Family is the only thing that is certain in life.

10. My father's love for being a first responder inspired me to follow in his footsteps. I'm also a Nassau County Police Officer, just like he was. I wear his shield proudly every day. It's a true honor.


ROBERT NEGRINI

Sworn to before me this
7th day of April, 2022


Notary Public

NICHOLAS SENGER
Notary Public - State of New York
No. 01SE6307628
Qualified in Suffolk County
My Commission Expires July 07, 2022

Samantha Negri

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
SAMANTHA NEGRI**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

SAMANTHA NEGRI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18 Redwood Lane, South Setauket, NY 11720.

2. I am currently 28 years old, having been born on September 21, 1993.

3. I am the daughter of Robert Negri, Jr. upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died of esophageal cancer on September 28, 2011. He was 56 years old, and I was only 18 years old at the time of his death.

5. My father was an integral part of my life. He would wake me up every day for school, make lunch for me, take me to soccer and after school activities. He would study with me all the time for school and even for college. He helped me with homework.

6. I was pretty young on September 11, 2001. I remember coming home, watching it on the news, and my mom telling me that dad was there but he was safe. By the time he was diagnosed with cancer, I was a junior in high school.

7. I remember that as clear as day. It was Christmas night, and my mom sat us down

at the kitchen table. I think we all knew something was going on, because my parents had seen a few doctors within a short period of time. It was a pretty somber tone. My mom said, "Dad is diagnosed with cancer, but it's okay. He has the best doctors." For the next few weeks, he went in and out of treatment in New York City.

8. It was extremely tough emotionally. I was a senior in high school when his illness really progressed. He really wanted to be there for my prom, but he wasn't in the best emotional or physical state. He wanted to watch me walk in to my prom, but he didn't have enough energy to sit outside and wait for me. But I still have a picture that we took that day. He also saw me graduate from high school, which I'm grateful for. That fall, things became even harder. I went away for college, so my mom dropped me off, and he couldn't be there on move-in day. He passed away from the cancer shortly thereafter. I came home from school for his funeral. I still finished the semester, but I did pretty poorly academically.

9. In terms of our family life, my mom was so strong to take him to all of his appointments. We had help from family and friends to help with me and my brothers. I helped taking care of my dad, like taking his medication and helping him get up from a fall. The heavy burden of taking care of my dad, however, truly fell on my mom. I don't want to take any credit from her because she really took care of him, especially towards the end of his life.

10. My dad was so committed to being a first responder throughout his career. He only retired because he was sick. Otherwise he would've kept working as long as he could have. Seeing how dedicated he was to the police force really impacted and shaped my work ethic as I started my own career. He taught my brothers and me a lot about dedication to family. I also feel personally connected to the 9/11 community. I run the 9/11 5k in New York City every year in his honor. I try to do things that honor my father in relation to 9/11. I also recently worked with my employer to help donate \$2500 to the 9/11 Memorial in honor of my father. That was really special to me.


SAMANTHA NEGRE

Sworn to before me this
8 day of April, 2022


Notary Public

OSKAR AGARONOV
Notary Public - State of New York
NO. 01AG6403623
Qualified in Kings County
My Commission Expires Feb 3, 2024

Vincent Negri

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
VINCENT NEGRI**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF SUFFOLK)

VINCENT NEGRI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18 Redwood Lane, South Setauket, NY 11720.

2. I am currently 23 years old, having been born on June 30, 1998.

3. I am the son of Robert Negri, Jr. upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from esophageal cancer on September 28, 2011. I was 13 years old at the time of his death. It was determined by the World Trade Center Health Program that my father's illness was causally connected to his exposure to the toxins in the air resulting from the September 11, 2001 terrorist attacks.

5. I was with my father every day that he wasn't at work. He would take us to sporting events: lacrosse games, football games, baseball games. We loved sports and would

always play catch together or watch sports on TV. He took me to the original Yankee Stadium, I'll never forget that. I got to experience new Yankee Stadium with him, too. He helped me with my homework. I took a lot of advanced classes at a young age, and my dad was a genius. He always helped me with math and science. He really pushed me to do my best in school.

6. I was three years old on 9/11. I have no recollection of the incident. Afterwards, I learned about what happened and the time my dad spent down at the World Trade Center. Knowing that he helped others, it made me feel proud.

7. We learned about my dad's cancer on Christmas night, after everyone had left. My siblings and I were all sat down at the dinner table and told the news. It was devastating, it was not something you expected at such a young age.

8. A lot of the little things that my dad would help us with fell to my mom. Although I love my mom dearly, she is not a math tutor. I remember trying to have my sister help me with school, and it just wasn't the same. It was a lot of little things that he would do for us that he just couldn't do anymore. He was too tired, he wasn't up to do anything anymore.

9. It was emotionally draining, seeing the person you look up to fall ill. It was terrible. When you're so young, you don't understand the gravity of the situation. I distinctly remember when I realized just how sick my father had become. My brother and I had just turned thirteen and were riding our bikes around the block. There was a car company filming a commercial for a nearby car show, and our neighbor had a cool vintage Chevy. They asked us if we wanted to participate in the car show, but we needed a parent signature on a consent form. My father was too tired, at 2 o'clock in the afternoon, to even sign a piece of paper for us.

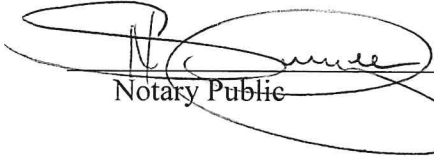
10. Another time, he fell out of bed. I remember this so clearly, because my mom and I had just picked up a car from our friend's house to pack my sister Samantha's luggage for her first drive to college. We got home, and all of a sudden, my mom was frantically yelling for me from the top of the stairs. She said, "Dad fell! And he's not okay." It was so difficult seeing him in a state like that. It was very hard.

11. For my twin brother and me, it was a hard age to lose your father. You go through a lot of change in your early teenage years. At that age, we didn't even have facial hair. He never even taught us to shave. It's a lot of the little things that you expect your father to teach

you. We missed out on all of that.


VINCENT NEGRI

Sworn to before me this
7th day of April, 2022


Notary Public

NICHOLAS SENGER
Notary Public - State of New York
No. 01SE6307628
Qualified in Suffolk County
My Commission Expires July 07, 2022

Michael Peter Norfort Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
MICHAEL PETER NORFORT, JR.**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

MICHAEL PETER NORFORT JR., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 603 MacDonough Street, Brooklyn, New York 11233.

2. I am currently 27 years old, having been born on April 24, 1994.

3. I am the son of Michael Peter Norfort, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on September 22, 2008, at the age of 44. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was only 14 years old when my father died. He and I had an amazing relationship. He was like an older best friend to me. We truly enjoyed spending time together. We loved watching basketball games and going on family vacations. My dad took me almost everywhere he went. He would always teach me about everything he knew, even at an early age. I idolized him.

6. On September 11th, 2001, my father was working in the exposure zone. He was a lead carpenter in the construction field, and he worked for the Carpenters Union. He wasn't

required to go down to the World Trade Center and help out, but he wanted to. That's who he was. I was very young at the time, so I didn't quite understand the significance of what was going on.


7. In 2007, my father became ill. My mother took him to see a doctor because he was complaining of horrible back pain. He was diagnosed with lung cancer. I was only 13 years old at the time my father was diagnosed. I couldn't comprehend how my dad could possibly have cancer. My mother tried to explain to me that he had cancer as a result of his work at Ground Zero after 9/11. It was emotionally devastating news for a young kid to learn.

8. My father played a huge role in my life, and his illness forced me to grow up faster. When he became sick, I had to start learning many things on my own. Being a teenager, his illness had a serious negative impact on me. Sometimes now, I still experience waves of emotion over his loss, even more than ten years later.

9. The time I lost with my father is indescribable. As a boy, you want your father there for everything you do. You want his love and guidance, and you want to make him proud. I know my dad was proud of me while he was alive, but there was so much more of me, and my siblings, that I would have loved for him to see. I feel that I was cheated out of that time with him due to his cancer and passing. I miss my father every day, and I feel so blessed to have had him in my life for the short period of time I did.


MICHAEL PETER NORFORT JR.

Sworn to before me this
20 day of ~~April~~, 2022


Notary Public

HAFIZ M. YAQOOB

Notary Public - State of New York

No. 01YA6174031

Qualified in Queens County

My Commission Expires September 10, 2023

Taj William White

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
TAJ WILLIAM WHITE**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

TAJ WILLIAM WHITE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 603 MacDonough Street, Brooklyn, New York 11233.

2. I am currently 22 years old, having been born on November 11, 1999.

3. I am the son of Michael Peter Norfort, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on September 22, 2008, at the age of 44. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was my teacher, my friend, and my mentor. Every day, my dad would take me to school before he left for work. He encouraged me to be productive and make the best of my day. My dad taught me the importance of having a good work ethic and a positive mindset. He instilled in me the importance of helping others. Growing up, our family participated in community outreach programs through our church, such as food drives, clothing

donations, and natural disaster assistance. I know my father worked hard so that my siblings and I could come home to a roof over our head and food on the table. I loved to go with my father, brothers and cousins to the park to play basketball. He built a makeshift basketball hoop in our neighborhood so that all the kids could play.

6. On September 11, 2001, I was only two years old. My father was a carpenter, and he was hired as an independent contractor through the Carpenters Union to work at Ground Zero. As I grew up, I learned about those who passed away on 9/11 or became sick as a result of their exposure at Ground Zero. I didn't know that my father would be one of them. My dad began to stay home from work more frequently, but I didn't realize that something was wrong. He hid his pain from me. Not much later, my mom sat me down and explained what was happening. I was afraid when I first learned that my father had cancer. My mom tried to comfort me and told me that dad would be okay soon, but with each passing day I watched his health decline.

7. It was extremely hard for me watching my father suffer, particularly at the young age of nine years old. The day he passed, I felt numb—mentally, emotionally, and physically. It still hurts to talk about my father's passing, let alone write about it. It's difficult to revisit those feelings.

8. The loss of my father continues to impact me and my family today. When my father passed, I became aware of the financial burden on our family. We nearly lost our home on multiple occasions and had to rely on friends and family members for financial assistance. I had to begin working while still in grade school in order to contribute to my household income. Even today, many of my ambitions have been placed on hold to ensure we have a home, let alone all the other necessities.

9. My father was a great inspiration to my life. His work ethic and drive has motivated me in my personal life. Watching him give back to others has inspired me to help those in need in my community. When my father wasn't teaching me with his words, he was teaching me through his actions. Although his time with me was short-lived, he has contributed to my life in ways that no one else ever could. Yet, there is no way to explain the hurt and loss I experienced, and continue to experience, due to his illness and passing. I know I have yet to

discover all the ways his loss will continue to impact me.

↗ Taj White
TAJ WILLIAM WHITE

Sworn to before me this

20 day of May, 2022

Hafiz M. Yaqoob

Notary Public

HAFIZ M. YAQOOB

Notary Public - State of New York

No. 01YA6174031

Qualified in Queens County

My Commission Expires September 10, 2023

Debora White Norfort

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
DEBORA WHITE-NORFORT**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

DEBORA WHITE-NORFORT, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 603 MacDonough Street, Brooklyn, NY 11233.

2. I am currently 57 years old, having been born on March 22, 1965.

3. I am the wife of Michael Peter Norfort, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from lung cancer on September 22, 2008, at the very young age of 44. It was medically determined that his cancer was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Michael was 100% involved in my life. He was an awesome father, husband, son, and person in general. We did so many things together, even simple things like gardening in our backyard. We would get up every Sunday and go to church together. We loved to go fishing, cook together, and go to social outings together. We spent a lot of time at home taking care of our kids. Michael had a passion for construction and building new things. He was our sole provider. He took care of us very well, and he was also a caretaker to his mother.

6. On September 11, 2001, Michael was at work. He was a carpenter employed by the Carpenters Union. Although it wasn't mandated that the union members go to Ground Zero, Michael volunteered because that's the kind of person he was. He worked directly on the pile of debris at the World Trade Center. He would tell us about how he was digging bodies out of the rubble, sometimes finding only body parts and not even whole bodies. We asked him not to tell us anymore about it because it was very difficult to listen to. Michael worked on the pile every single day for at least a week.

7. In 2007, we were in the process of gutting and renovating a new home we had recently purchased. During that time, Michael developed a hacking cough. After about a month, I told him that he needed to go to the hospital to get it checked out, but he kept on putting it off. A couple of months later, while I was at work one night, I called the house to check on things. My 7-year old son answered the phone and told me that they hadn't even eaten dinner yet. I knew I had cooked before I left and that Michael was going to feed them. I asked him where his father was and he told me his dad was in bed. That was the first red flag. I immediately called Michael. He said he didn't feel well and had terrible back pain. I left work, went home, and took him to the hospital.

8. On Thanksgiving weekend in 2007, Michael was diagnosed with lung cancer. I was devastated, saddened, and shocked. At the time, I was working as a social work case manager. I took several days off work to take Michael to his chemotherapy treatments. We would go to chemo from 9:00 a.m. to 5:00 p.m. once every three weeks. It was exhausting. My job didn't allow me to take FMLA, because Michael and I weren't married at that time. His condition really started to decline in approximately August of 2008. I resigned from my job to become his full-time caretaker on August 29, 2008.

9. I no longer had a life outside of Michael's illness. There were many family functions and milestones I missed because I had to assist Michael. I didn't have anyone to come and help me. It was just me and him. It made things extremely hard. I couldn't help my kids with their homework or with day-to-day tasks. My sister and nephew came to help take care of my kids when they could. We paid a young lady to come in and help with our housekeeping, because I could barely keep up with it. I couldn't drive Michael to and from his appointments, so my neighbors and nephew had to drive us. It was so overwhelming. There were days where I just broke down and cried. Once, when I was at the hospital with Michael, I came out of the

bathroom, and he said, “You don’t really have to go to the bathroom. You just went in there to cry. You don’t have to lie. I’m going to get better so I can take care of my family.” Just to hear him say something like that was a dagger in my heart. I felt so sorry for him. I felt so sorry for me and the kids, too. I spent the last 10 months of his life in the house taking care of him.

10. As for our finances, Michael had some money saved away so we were alright in the beginning. Then, towards the last four months, things started getting extremely difficult financially. My kids were also young at the time, so it was hard to balance their needs with Michael’s. I didn’t know that my children were eligible for Social Security child benefits at the time. Family members chipped in and helped out, as Michael’s medications weren’t covered through the insurance. Sometimes, we had to spend a thousand dollars out of pocket on his medications.

11. Michael was a hard worker. He was a caretaker to his mother and father. He raised my two older children, Tiffany and Gary, who were not his biological children. He raised them as if they were his own. He was a wonderful father to all our children. Michael would always help people—friends, family members, and neighbors. When Michael was diagnosed with cancer, it touched a lot of souls. When he passed, we had two rooms in the funeral home, but so many people came to pay their respects that we needed a third room. That’s the impact that he had. I miss him so much. It’s difficult for me to watch my children try to navigate through life without their father. They go to their sports games and see everyone else with their dad there. Although Mom is always sitting in the stands, I know it’s not the same for them.

12. Michael always hoped to one day have his children work in the construction trade with him. After Michael was diagnosed with cancer, he got Gary a job in construction. He was so excited for Gary that he went with him to his first day on the job. Michael had lost so much weight by then and was down to about 101 lbs. The boss told Gary that if he brings his sick father back to this construction site, he’d have to fire him.

13. Michael made a good life for himself and his family. I can say that he’s truly missed by everyone who had the privilege to know him. His passing put a big strain on our family emotionally and financially. Today, I am fighting a foreclosure on my home. I wouldn’t be going through what I’m going through if Michael were still here. He was a good husband. When I first met him thirty years ago, Michael was in Phoenix House (a drug and alcohol rehabilitation program). We went out to dinner for his birthday, and I paid. Later that night, he

said, "When I get out and go back to work, seventy-five cents of every dollar is yours." He kept that promise to me. He was a man of his word. Michael was an amazing husband, and he is sorely missed.


DEBORA WHITE NORFORT

Sworn to before me this
05th day of April, 2022


Notary Public

HAFIZ M. YAQOOB
Notary Public - State of New York
No. 01YA6174031
Qualified in Queens County
My Commission Expires September 10, 2023

John M. Organ

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF PATRICIA
D'AMORE ON BEHALF OF
JOHN M. ORGAN'S ESTATE**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
: SS.:
COUNTY OF MONMOUTH)

PATRICIA D'AMORE on behalf of JOHN M. ORGAN, being duly sworn, deposes and says:

1. I am over 18 years of age and reside at 80 Riverbrook Avenue, Lincroft, New Jersey 07738.

2. I am the aunt of plaintiff, John M. Organ, who was pursuing a solatium claim based on the illness and death of his father, Dennis M. Organ. John, as the personal representative of his father's estate, was also pursuing a claim on behalf Dennis's estate.

3. My nephew, John M. Organ, passed away on November 30, 2021, after the commencement of the within action. I am the presumptive representative of my nephew's estate but have yet to be formally appointed.

4. I submit this Affidavit on John's behalf in connection with the pending motion for a default judgment and in support of his solatium claim. Although I am the former sister-in-law of Dennis M. Organ, I have no meaningful knowledge about Dennis's pain and suffering and am

therefore, not submitting an Affidavit on behalf of Dennis's estate.

5. John's father, Dennis, passed away from metastatic colorectal cancer on July 22, 2013, at the age of 64. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

6. Dennis and John had a typical father-son relationship. They spent a lot of time together, although they did not live together. Before Dennis got sick, his relationship with his son John was really starting to develop—they were beginning to form a closer bond, a more hands-on relationship. Dennis and John's mother (my sister) divorced when John was very young, so I did not interact much with Dennis after they divorced. John is an only child, and when his mother passed from breast cancer, he was devastated. So, his only living parent was his father. He wanted to be closer to his father after his mother died.

7. Dennis was an NYPD police officer, who went down to the World Trade Center to recover bodies from the pile on and after the September 11, 2001, terrorist attacks.

8. Dennis told John right away when he was diagnosed with colorectal cancer. He was diagnosed sometime around 2011 or 2012. John spent time taking care of his father, bringing him to doctors' appointments and treatments. Dennis went through radiation, but it didn't help to get rid of his cancer. John went back and forth to his father's home every day to take care of him, especially after Dennis had a fall where he fractured his collarbone. John helped Dennis with whatever he needed. He focused on his father more than he focused on himself.

9. John was extremely distressed by his father's cancer diagnosis, especially since Dennis was his only living parent. John was a young man when his father was diagnosed with cancer, only about 34 years old. He and his dad had wanted to spend more time together. They were planning to go away on vacation before they learned of the cancer diagnosis. John also had his own medical conditions to deal with, so his dad's illness put a lot of stress on him. John was in and out of the hospital himself, even while his father was sick. John became very depressed over it. Dennis's illness and eventual death took a toll on John's mental health and his ability to fight his own illness.

10. John struggled with his own illnesses from birth. He had two liver transplants and a kidney transplant. For him to now be alone, with no mother or father, was really hard for him.

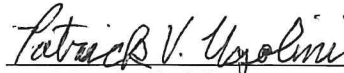
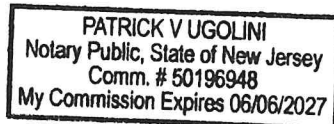
Due to COVID-19, he ran into medical issues of his own which led to his death. Following Dennis's death, John missed his dad terribly and suffered greatly as a result of the loss.



PATRICIA D'AMORE on behalf of
JOHN M. ORGAN'S ESTATE

Sworn to before me this

27 day of July, 2022


Notary Public

Nicole S. Carollo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

Plaintiffs,

**AFFIDAVIT OF
NICOLE S. CAROLLO**

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NORTH CAROLINA)

: SS.:

COUNTY OF UNION)

NICOLE S. CAROLLO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2669 Southern Trace Drive, Waxhaw, North Carolina 28173.

2. I am currently 43 years old, having been born on December 12, 1978.

3. I am the daughter of Stephen E. Phillips, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My dad died from colon cancer on August 2, 2015. He was only 58 years old. It was determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was 36 years old when my father died. He was my best friend. I would speak with him every day, and he often would see and spend time with me and my two sons.

6. On 9/11, my father was working at the Fulton Fish Market. He watched the World Trade Center attacks from his workplace. He stayed to drive people across the bridge into Brooklyn.

7. In 2013, my father went for a routine doctor's appointment. I got a phone call from him and my mother telling me that he was sick. Once I found out about his illness, I was shocked with fear. I felt scared, empty, and sad, realizing that my father wouldn't be there for milestones that he should've been. I felt lost, empty, and angry.

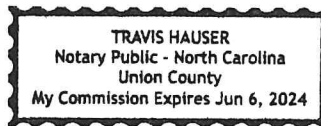
8. My father's premature death and his absence in my life has been extremely difficult for me and my family. I miss him so much, and am very sad that he will never get to experience and be part of the lives of my children and me.


NICOLE S. CAROLLO

Sworn to before me this

12 day of April, 2022


Notary Public



Craig S. Phillips

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
CRAIG S. PHILLIPS**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF CONNECTICUT)
 : SS.:
COUNTY OF FAIRFIELD)

CRAIG S. PHILLIPS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 16 Holly Lane, Sandy Hook, CT 06482.
2. I am currently 39 years old, having been born on July 16, 1982.
3. I am the son of Stephen E. Phillips, upon whom my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My dad died from colon cancer on August 2, 2015. He was only 58 years old. It was determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I was 33 years old when my father died. We had a very good father-son relationship. We would play sports and watch sports together. We enjoyed learning about technology together. He helped around the house and taught me how to be a handyman in my own home.
6. At the time of 9/11, I was in college. I was just leaving class when I found out the news about the World Trade Center attacks. When my father finally returned home from

his job in lower Manhattan, I learned about his experience. He helped ferry people over the bridge from Manhattan to Brooklyn to bring them to safety.

7. His experience on 9/11 took over his life for 6-8 months. He struggled with Post-Traumatic Stress Disorder. I watched my father absorb the news content about the World Trade Center attacks and witnessed how it impacted him daily.

8. My father went for a routine check-up in 2013 when we got the news that he had colon cancer.

9. I didn't realize it during the time of my father's illness, but after he passed I recognized that I had begun to experience extreme symptoms of anxiety and stress about his diagnosis and death. I had to go through therapy and used EMDR techniques to get past the hurdles of not having him in my life anymore.

10. When my father was diagnosed with colon cancer, I used to take him for treatment in New York. My parents then moved to South Carolina, but I was still in New York. I traveled frequently to go see him, as my son was an infant at the time and I wanted him to spend time with his grandfather. I also have a daughter who was born after he passed, and I am saddened that my daughter was never able to meet her grandfather. I speak about this with my therapist often. I remember assisting my father with bathroom runs and medical care. As his son, I never thought I would have to experience taking care of my father in that way.

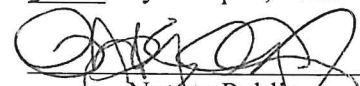
11. My sister, mother, and myself supported each other as best we could, but the physical distance between where I lived and where my parents lived caused added stress. This dynamic put stress on our family relationship, which we are working hard to recover.

12. Even though I know my dad's cancer was related to 9/11, my family and I still worry about the risk of colon cancer. Before my father, no one in our family was diagnosed with colon cancer. Now, my sister and I must undergo a colonoscopy every six months to check for cancer. It weighs on us as we get older.



CRAIG S. PHILLIPS

Sworn to before me this
5th day of April, 2022


Notary Public
(commission expires 02/28/2025)